

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

|                                      |   |                                    |
|--------------------------------------|---|------------------------------------|
| STATE OF MAINE,                      | ) |                                    |
|                                      | ) |                                    |
| Plaintiff,                           | ) |                                    |
|                                      | ) |                                    |
| v.                                   | ) | Civil Action No. 2:22-cv-00204-JDL |
|                                      | ) |                                    |
| LIBERTY BELL MOVING & STORAGE, INC.; | ) |                                    |
| and KEVIN FINKENAUER,                | ) |                                    |
|                                      | ) |                                    |
| Defendants.                          | ) |                                    |

**JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT**

Plaintiff the State of Maine (the “State”) and Defendants Liberty Bell Moving & Storage, Inc. and Kevin Finkenaure (collectively, “Liberty Bell”) (the State and Liberty Bell, collectively, the “Parties”), through their respective undersigned counsel, hereby jointly move for entry of a Consent Judgment in this matter. The bases of this Motion are as follows:

1. The Parties have reached a resolution of this matter that fully and finally resolves all claims and have executed the Consent Judgment attached hereto as Exhibit A.
2. The Parties’ resolution contemplates the Court’s entry of the Consent Judgment.
3. The Parties therefore respectfully request that the Court enter the Consent Judgment as full and final resolution of this matter and stay any pending deadlines until the same is accomplished.

WHEREFORE, Plaintiff the State of Maine and Defendants Liberty Bell Moving & Storage, Inc. and Kevin Finkenaure respectfully request that the Court execute the Consent Judgment attached as Exhibit A and enter it on the docket.

Dated: January 18, 2023

/s/ Michael Devine

Michael Devine  
Laura Lee Barry Womack  
Assistant Attorneys General  
6 State House Station  
Augusta, ME 04333  
(207) 626-8800  
[michael.devine@maine.gov](mailto:michael.devine@maine.gov)  
[lauralee.barrywomack@maine.gov](mailto:lauralee.barrywomack@maine.gov)

Attorneys for Plaintiff the State of Maine

/s/ Zachary Brandwein

Eben M. Albert  
Zachary B. Brandwein  
BERNSTEIN SHUR  
100 Middle Street  
P.O. Box 9729  
Portland, Maine 04104-5029  
(207) 774-1200  
[ealbert@bernsteinshur.com](mailto:ealbert@bernsteinshur.com)  
[zbrandwein@bernsteinshur.com](mailto:zbrandwein@bernsteinshur.com)

Attorneys for Defendants Liberty Bell  
Moving & Storage, Inc. and Kevin  
Finkenaure

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing Joint Motion for Entry of Consent Judgment with the Clerk of Court using the CM/ECF system, which will automatically send notice of such filing to all counsel of record in this matter.

Dated: January 18, 2023

/s/ Zachary B. Brandwein  
Zachary B. Brandwein